



Shotley Peninsula Cycling Campaign

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Dear Sirs,

Response to Planning Application B/12/00500/FUL – Redevelopment of the Former HMS Ganges Site at Shotley Gate

This is the response of the Shotley Peninsula Cycling Campaign (SPCC), to planning application B/12/00500 concerning the proposed redevelopment of the HMS Ganges site at Shotley Gate.

The SPCC was formally constituted in March 2010, at a very well-attended public meeting. We now have over 200 members, plus 10 local organisation members, including all the schools within the project area. The purpose of the SPCC is to campaign for the promotion of safer cycling throughout the Shotley Peninsula, and specifically, for the provision of a new network of community paths suitable for pedestrians, cyclists, and wheelchair users, for both commuter and recreational use. The campaign was, in large measure, initiated over concerns about the likely redevelopment of the HMS Ganges site and the extent to which this would inevitably worsen conditions for cyclists on the B.1456. Our priority project, therefore, is the creation of a new, largely traffic-free, Community Path, from the edge of Ipswich down to the foot ferry at Shotley Gate, along the B.1456 corridor.

Last year the SPCC commissioned Suffolk County Council(SCC) to prepare a feasibility study to identify a draft route for this path, (see details of this, plus maps, on our website at www.spcc.info); these proposals have received widespread support from the Shotley Peninsula community. We have also been working closely with Babergh District Council(BDC), Sustrans, The Suffolk Coasts and Heaths Partnership, as well as the Parish Councils directly benefiting from the proposed path, who have all been equally supportive.

Our ambition is to increase cycling on the Shotley Peninsula by making it safer and more enjoyable. Central to this is making the B.1456 safer for cyclists and providing walkers and wheelchair users with the opportunity to get away from traffic. The creation of the new path along the peninsula would remove the most vulnerable road-users (cyclists and pedestrians) from the already busy, potentially dangerous, and in places sub-standard, B1456. According

to further research we have recently commissioned from Sustrans, the provision of this path is also likely to lead to a doubling of cycling along this corridor to nearly 30,000 cycle journeys per year. The new path would have a number of other advantages:

1. Helping to increase peoples health and fitness, and reducing obesity
2. Providing a sustainable and cheap alternative to car usage
3. Helping to reduce traffic congestion and thereby improving road safety
4. Helping to reduce carbon and other harmful emissions
5. Increasing recreational opportunities and tourism
6. Increasing access to the countryside for those with restricted mobility
7. Improving connections between local communities, and their local services
8. Providing children with safer, greener, routes to schools

For these reasons SPCC has a keen interest in the outcome of this significant planning application but has confined its comments to those issues set out in its Objectives, namely, the promotion of safe cycling on the peninsula. Having regard to our Objectives we would therefore have considerable concerns about any planning application which would increase vehicular traffic on the already busy B1456 (see the SPCC's 2011 Traffic Survey figures collected by us in the late summer of 2011 at www.spcc.info). The B1456 is already a challenging cycling experience, and too intimidating for most people to attempt to cycle, although in all other respects the Shotley Peninsula has the ingredients of an ideal cycling environment. Furthermore, despite a reasonable network of rural footpaths, opportunities for the less physically able to enjoy the area are very limited.

Reference to the applicant's Transport Assessment makes it clear in paragraph 8.19 and Figure 8.2 in the appendices that whilst this new application will result in a smaller increase in traffic on the B.1456 than the '325 dwelling' scheme, the B.1456 will still be significantly busier by 2017 than it is now. According to the applicant's own traffic flow figures in Figure 8.2, at the site access (on the B.1456) traffic, with this development in place, will increase by up to 200% in the peak periods. At Erwarton Walk the increase in traffic will be approximately 100% during the peaks, with the corresponding figures for Freston crossroads being between 32% and 61%. Even at the Wherstead roundabout where traffic is already very heavy the growth in the AM traffic peak will be 26%. These are still very significant increases and will inevitably make the B.1456 even less appealing for cyclists and correspondingly more dangerous.

This large increase in traffic on the B.1456 needs to be viewed against the comments made by the Secretary of State in her July 2006 decision letter following the Public Inquiry into the '325 dwelling' scheme. At that time she stated that 'she agrees that local roads may become less pedestrian-friendly and cyclists may be deterred, and accepts that this would represent a negative aspect associated with increased traffic'. Along with other negative impacts she lists in her decision letter, she goes on to 'give these negative impacts significant weight'. This current application would also continue to have a significant negative impact on cycling on the B.1456, and we would suggest that the applicant will need to take measures to mitigate this impact before this application can be approved.

The SPCC is therefore of the view that if Babergh District Council is minded to approve this planning application for the HMS Ganges site, then it is essential that a new, safe, off-road community path is created between Ipswich and Shotley Gate. The SPCC is therefore pleased to note that the applicant fully acknowledges the production of our 2011 Draft Report prepared for us by SCC proposing the creation of the Shotley Peninsula Community Path referring to it as a 'comprehensive study'. The applicant states that this report presents a 'compelling case' for this new path and 'is keen to work in partnership with SCC, as Local

Highway Authority, and the SPCC, to help deliver the Community Path proposals', going on to say that 'a financial contribution towards enhanced off-site cycle and pedestrian infrastructure will be secured through a S.106 Agreement'. Furthermore the applicant states that the level of the S.106 contribution towards the Community Path (and other proposals in the Workplace and Residential Travel Plans) is still to be agreed and that they would like to have discussions with SCC and SPCC about the process for this S.106 contribution for the Community Path and the appropriate level of that contribution.

In this context the Planning Committee is asked to note that some sections of the Community Path have already reached a relatively advanced stage of planning. On the first section between Bourne Bridge on the edge of Ipswich, and Freston Boot at the top of Freston Hill, we have reached provisional agreement on a route with the landowners. At the other end of the path, on the section between Shotley Street and the foot ferry at Shotley Gate, things look even more advanced: this section of the path lies wholly on land owned by Suffolk County Council who are currently working up a detailed scheme for us. Subject to funding, this section of the path could be progressed in the near future.

As the applicant suggests the size of the S.106 contribution towards this path will need to be the subject of discussions between the Council, SCC, the SPCC, and the applicant. However it is essential that this financial contribution is a very significant one and large enough to ensure that this new path can actually proceed. As part of their work for us last year, SCC have also provided an indicative cost for the whole eleven miles of the path of about £2.2 millions although we believe that it may be possible to build the path for less than this. However, the point to note here is that providing a properly constructed, 2.5m wide, surfaced cycle path (also suitable for pedestrians and wheelchair users) does not come cheaply nowadays (about £ 200,000 per mile would be typical for the construction costs alone). Whilst it would probably be unreasonable to expect the site developer to pay for all of this having regard to the viability test set out in the recent National Planning Policy Framework(NPPF), there is no realistic prospect of even the most needed sections of path being constructed unless the developer is required to make a very substantial contribution towards the cost of this path. This, obviously, needs to be the subject of more detailed discussions. We consider the most needed sections are those between Bourne Bridge and the top of Freston Hill (where traffic flows will continue to be the highest on the B.1456) and between Erwarnton Walk and the Shotley Gate (where the largest percentage increase in traffic will be felt, especially by children travelling to the local primary school in Shotley Street).

The worst of all worlds for the Shotley Peninsula community would be a small five-figure contribution towards this path from the developers, another 285 homes at the far end of the peninsula, but no new Community Path. Even £50,000 would pay for no more than the expected design and supervision fees. The SPCC are therefore strongly of the view that if the applicant will not sign a S106 Planning Obligation committing a significant financial contribution towards the Community Path, then BDC should refuse this planning application.

In order to help establish the appropriate level of this and other S106 payments, we also hope that BDC, if they have not already done so, will commission an independent financial appraisal of the scheme and therefore review the total S106 pot currently being offered by the applicant. In this way all parties, but particularly BDC and the local community, could feel confident that, in the event of this application being approved, the applicant commits sufficient funding, via a S.106 financial package, to properly mitigate all the negative impacts of this proposed development (whilst still ensuring that the development remains viable in accordance with para 173 of the NPPF). This is exactly the approach advocated in the Suffolk-

wide SPG recently adopted by the Council entitled ‘ S.106 Planning Obligations Guidance for Developers’ (paras 3.21 – 3.23 refer).

With regard to on-site cycling provision SPCC strongly supports the proposal for a 3m wide dedicated cycle path and footway on the south/west side of the proposed spine road. However we are concerned to see that the applicant’s ownership does not appear to allow for this cycleway to link into the Marina site and therefore the foot ferry and the National Cycle Network path No.51. Instead it appears that this connection will not happen until/unless the construction of the marina housing scheme goes ahead. The SPCC would therefore ask BDC to ensure that the applicant provides an interim, short-term, cycle path connection into the Marina site.

In Summary, the SPCC is of the opinion that:

1. This planning application would significantly increase the amount of traffic using the B.1456 and would therefore have a negative and, we believe, unacceptable impact on cyclists and pedestrians wishing to use this already busy and dangerous road.
2. However if Babergh District Council is minded to approve this planning application, then this development should only be allowed to proceed if a significant part of the Shotley Peninsula Community Path (for cyclists, pedestrians and wheelchair users) can be put in place.
3. A detailed proposal for the Community Path already exists and some sections of the path have now reached an advanced stage of planning and could be constructed in the relatively near future.
4. Provision of the path is best achieved by the applicant being required to make a very substantial financial contribution towards its construction, secured as part of a S.106 Planning Obligation.
5. The exact size of that financial contribution should be the subject of further research and discussions, involving BDC, SCC, the applicant and the SPCC..
6. Furthermore, BDC should take independent advice about the overall size of the S106 pot to be offered by the applicant by requiring a financial appraisal of the whole scheme, to ensure that the applicant commits sufficient funding to properly mitigate the negative impacts of this significant development.
7. SPCC supports the early introduction of a dedicated cycle path and footway across the site into the adjacent Marina site.

Yours sincerely,

Mike Crouch
Chairman
Shotley Peninsula Cycling Campaign